

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**RE: BAY STATE GAS COMPANY**

**DTE 06-31**

**THIRD SET OF INFORMATION REQUESTS OF LOCAL 273**

**UWUA 3-1:**

Please describe the respective roles that individuals at Bay State (e.g., Steve Bryant, Dan Cote, and those serving under them) and/or NiSource or NSCS employees or consultants play in determining the annual level of investment in replacement of pipe on Bay State's distribution system. Include the names and titles of the individuals involved, and the role that each individual plays.

**UWUA 3-2:**

Please describe the respective roles that individuals at Bay State (e.g., Steve Bryant, Dan Cote, and those serving under them) and/or NiSource or NSCS employees or consultants play in determining the annual level of investment in leak detection and repair on Bay State's distribution system. Include the names and titles of the individuals involved, and the role that each individual plays.

**UWUA 3-3:**

(a) Please provide a table listing the month-by-month investments (\$) in replacement of gas mains and services on Bay State's system, for the period January 2005 to the most recent date available.

(b) Please provide a table listing the month-by-month leak rates on Bay State's system, for the period January 2005 to the most recent date available. To the extent available, include data by category of the leak (1, 2 or 3), sorted by mains v. services, and sorted by division (Brockton, Springfield, Lawrence).

**UWUA 3-4:**

[See response DTE-BSG 1-13] Provide a set of similar “Current staffing level” tables, but showing staffing levels for January 1 and June 30 for the years 2004 and 2005, and for January 1, 2006.

Respectfully Submitted,

Charles Harak, Esq.  
Counsel for Local 273  
77 Summer Street, 10<sup>th</sup> floor  
Boston, MA 02110  
617 988-0600 (ph)  
617 542-8028 (fax)  
charak@nclc.org

DATED: July 26, 2006